

## UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

March 07, 2025

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America

v.

Margarita Melendez-Moreno  
aka: Margarita Melendez-Lucio  
XXX XXX 787Defendant(s)BY: AC  
DEPUTYCase No. **SA:25-MJ-363****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 7, 2025 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. § 1326(a) &amp; (b)(2)

Illegal Reentry

Penalties: Maximum Penalties: 20 years confinement, \$250,000 Fine or  
Both; 3 years supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.  
Complainant's signatureRuben J. Rios, Deportation Officer  
Printed name and title

- ☐
- Sworn to before me and signed in my presence.
- 
- ☒
- Sworn to telephonically and signed electronically.

Date: March 7, 2025  
Judge's signatureCity and state: San Antonio, TexasHonorable Henry J. Bemporad, U.S. Magistrate Judge  
Printed name and title

Being duly sworn, I declare that the following is true and correct to the best of my knowledge:

My name is Ruben J. Rios, and I am a Deportation Officer with Immigration and Customs Enforcement ("ICE")/Enforcement Removal Operations ("ERO"), with whom I have been employed since October 15, 2007. I am authorized by the United States Department of Homeland Security to enforce the Immigration Laws and Regulations of the United States, or any other Laws or Regulations designated by the Attorney General or his successor, the Secretary of the Department of Homeland Security.

On March 7, 2025, Margarita MELENDEZ-Moreno aka: Margarita Melendez-Lucio(hereafter "MELENDEZ"), was encountered after the San Antonio Police Department stopped her for a traffic violation in Bexar County, Texas, which is located within the Western District of Texas. San Antonio Police Department Officers contacted ICE/ERO and provided them with the subject's name and date of birth. ICE/ERO Officers conducted immigration history and criminal history inquiries and determined MELENDEZ to be an alien illegally present within the United States and who had been previously removed from the United States. ICE/ERO dispatched officers to the scene to apprehend MELENDEZ. MELENDEZ was subsequently transported to the ICE/ERO San Antonio office for processing.

At the ICE/ERO office, MELENDEZ's fingerprints were enrolled and submitted through immigration and FBI databases, which verified her identity. The databases revealed that MELENDEZ is a citizen or national of Mexico with assigned Alien Registration Number A-XXX-XXX-787. A review of A-XXX-XXX-787 in the Enforce Alien Removal Module ("EARM"), a Department of Homeland Security database, revealed that MELENDEZ is an alien who was previously removed from the United States to Mexico on or about December 6, 2000.

A review of MELENDEZ's criminal history revealed that she was convicted of 21USC § 841(a)(1) & 18 USC § 2, Aiding and Abetting the Possession with Intent to Distribute Cocaine, in the United States District Court, Western District of Texas, San Antonio Division and sentenced to 41 months imprisonment.

Immigration databases revealed that MELENDEZ has not been granted permission to reapply for admission from the Attorney General of the United States, or his successor, after her removal.

On March 7, 2025, the defendant was informed of her right to a consular notification and was provided an opportunity to call the Consulate General of Mexico upon her arrest. On March 7, 2025, the Consulate General of Mexico was notified of MELENDEZ's arrest. An immigration detainer will also be filed with the U.S. Marshals Service.



Ruben J. Rios  
Deportation Officer  
Immigration and Customs Enforcement

Subscribed and sworn before me the 7th day of March 2025.



HONORABLE HENRY J. BEMPORAD  
UNITED STATES MAGISTRATE JUDGE